



INF. 10

21 November 2019

Original: German

RID: 11th Session of the RID Committee of Experts' standing working group
(Vienna, 25 to 29 November 2019)

Subject: Stress resistance of tank-wagons in accordance with 6.8.2.1.2 of RID

Comments by Germany on INF.4 (UIP)

1. This informal document contains comments by Germany on the amendments proposed by UIP in informal document INF.4.
2. Re (a)(1): Addition of "(test pressure/1.3)"

In the original proposal, the wording "maximum working pressure" was chosen deliberately, as this term is defined in 1.2.1 of RID. However, this definition does not include the formula mentioned here. Moreover, the justification in paragraph 5 of INF.4 is not valid, as it is not decisive for the assessment whether the working pressure is indicated on the tank or not; of course, the relevant approval documents (in particular the calculations) of the respective tanks have to be consulted in this context.

3. Re (a)(4): Addition of the reference to standard "EN 12663-2:2014"

The proposed addition is both superfluous and incorrect in terms of content. There is no standard "EN 12663-2:2014"; the relevant standard is EN 12663-2:2010. The application of this standard is set out in WAG TSI, which is already quoted in the footnote and which is unambiguously referenced in paragraphs (1) to (3) by the wording "the load cases applicable to the assessment of the ability to withstand stresses". Mentioning the specific standard in RID triggers additional maintenance effort when WAG TSI is amended and thus poses in particular the risk of inconsistencies. Only a general reference to the application of the permissible stresses in accordance with the assessment of the ability to withstand stresses provided for in WAG TSI (currently in accordance with EN 12663-2:2010; in the future, however, possibly in accordance with a newer or even a different standard) could be discussed.

4. Re (a)(4): Moving the words “and for tanks with a liner”

This proposal has no detrimental effects (matter of taste).

5. Re (b): Replacement of the term “ability to withstand the stresses” by “suitability”

This replacement is misleading and even incorrect, as “suitability” also includes the chemical resistance, which certainly also has to be examined within the approval procedure, but not within the framework of assessing the stresses resulting from rail transport in accordance with 6.8.2.1.2 of RID. In this context, initially, only the mechanical suitability is assessed; in the original proposal, this is described by “assessment of the [...] ability to withstand stresses”.

6. Re (b): Addition of “particularly those with weaker elastic properties than the tank walls, e.g. hard rubber or enamel.”

This addition is superfluous and misleading, as the liner’s ability to withstand stresses always has to be assessed, irrespective of the material it is made of. It is indisputable that liners made of hard rubber and enamel are especially critical cases, but this is not relevant here.

7. Re (b): Replacement of the term “tested” by “assessed”

This proposed amendment can be supported, as it achieves harmonisation with the wording in (a) in the German text.

8. Re (b): Deletion of the last sentence

The phrase is to ensure that a necessary exchange of information between the inspection bodies involved takes place. At best, the deletion of the reference to the maximum elongations in brackets could be considered, as the necessary information could, if appropriate, be specified in greater detail in standard EN 14025.
